



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

November 23, 1994

Mr. Kevin Schanilec
EPA-Region X
1200 Sixth Avenue
Seattle, WA 98101

RECEIVED

NOV 28 1994

RCRA Compliance Section

Dear Mr. Schanilec:

Re: Closure Plan, Closure of Freuhauf Pit, Large Pit, Sump
No. 2 and 4, Northwest EnviroService Inc., July 1994

EPA has completed an extensive review of this closure plan. The following Ecology comments on the above closure plan will not attempt to duplicate EPA's comments, but only add comments where Ecology noticed additional deficiencies.

General Comments

1. If EPA's signature authority is to be Betty Wiese, then the signature authority from Ecology would be Julie Sellick; title, Hazardous Waste and Toxics Reduction Section Head.
2. Because EPA and NWES have been negotiating these closure activities through orders, Ecology is at a disadvantage in knowing all the issues involved in any settlement discussions. Therefore, it is unclear in the closure plan and in EPA's comments which unit will be handled as the surface impoundment. In the Complaint and Compliance Order (RCRA Docket No.:1092-08-07-3008(a)), two surface impoundments (Freuhauf Pit and Large Pit) and two tanks (Sumps #2 and #4) were identified. In the revised closure plan, specific units will need to be clearly identified as surface impoundment or tanks.

Ecology also assumes that any groundwater contamination will be handled through the RCRA corrective action process.

4. Include detailed descriptions and figures for all units.
5. Cost estimates for the closure work should be provided in the revised plan.

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Specific Comments

1. Page 1. Section 1.1. Closure Activities: The plan should specify that the backfill material will be clean material.
2. Page 3. Section 1.1. Closure Activities: Is there to be a specific ground water monitoring network around each unit? How easy will it be to distinguish other potential sources of contamination? If during any ground water investigation, significant ground water contamination is found, interim measures should be instigated prior to CMS and CMI steps of the corrective action process.
3. Page 3. Section 1.1. Closure Activities: The plan should include the name and phone number of a NWES contact person. Also, the requirements for notification are 45 days for tanks and 60 days for surface impoundments.
4. Page 4. Section 2.1. General: The plan should specify how Sumps 2 and 4 will be put back into service after closure. If the intent is to be used for hazardous waste, this will require a final hazardous waste permit before use. If for non-hazardous waste, use after closure can happen immediately.
5. Page 6. Section 2.2. Oil Water Separator Tank/Fruehauf Pit: In the last sentence there is a typographical error: "solid-phase waste steams" should be changed to streams. Also, what type of landfill, a solid waste landfill or a hazardous waste landfill, will the sludge be sent to? Will any treatment be necessary?
6. Page 6. Section 2.3. Primary Sedimentation Tank(PST)/Large Pit: What type of landfill will the solids from the PST be sent to? See comment 5 above.
7. Page 6. Section 2.4. Sump No. 2: The physical description for the sump is not included, only the location.
8. Page 10. Section 4.2. Specific Performance Standard: Rinsate samples are not acceptable for determining clean closure for tanks or surface impoundments, but the information may be necessary for discharges to the sewer system (METRO).

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9. Page 11. Section 4.2. Specific Performance Standard: The last bullet item should specify a concrete core.
10. Page 11. Section 4.2. Specific Performance Standards: When using MTCA methods A or B, all sections of MTCA pertaining to those methods will need to be evaluated. This will be important if multi-constituents are involved.
11. Page 11. Table 4-1: The heading should specify Concrete/Soil.
12. Page 11. Table 4-1 and Footnote: It should be noted that the data for Vinyl Chloride was collected in April 1992 and is not acceptable for setting a standard if the unit continued to operate after that sample date.
13. Page 12. Section 5.3. Decontamination of Units: In step number one, it should be acknowledged that all cracks or openings will be thoroughly mapped before sealing. These will potentially be areas for soil sampling locations.
14. Page 13. Figure 5-1: No figure enclosed.
15. Page 14. Section 5.3. Decontamination of Units: Step 3 should just specify 40 CFR 268.45. The specific reference to (d)(5) may not be appropriate depending on the actual procedures used.
16. Page 15. Section 5.4. Performance Standard Verification: The soil samples should initially be collected at the concrete/soil interface. If contamination is discovered, samples at various depth will be required.
17. Page 15. Analytical Methods Table: Typographical error on the line for Sump No. 2, it should read SW846 not SW840. For EPA, explain why TCLP extraction method 1311 is not acceptable.
18. Page 16. Section 5.7. Lining of Sumps: If Sumps No. 2 and 4 are to be placed back into service accepting hazardous waste, they will need to meet the tank standards.

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19. Page 18. Section 6.0. Closure Certification: The facility has 60 days, not 14 days, to submit a signed certification. The certification is to be signed by the owner or operator and an independent registered professional engineer. The certification is to be sent to the regulatory agencies by registered mail.

If you have any comments or questions on the above review, please call me at 649-7026.

Sincerely,

Sally Safioles

Sally Safioles
Hazardous Waste Hydrogeologist
Hazardous Waste and Toxics Reduction